IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO: 3:17CR158
	)	
	)	JUDGE JACK ZOUHARY
	)	
Plaintiff	)	
	)	**NOTICE OF REQUEST**
v.	)	**FOR DISCOVERY**
	)	
ANTHONY HAYNES	)	
	)	
Defendant.	)	

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the Defendant

requests discovery and inspection with the right to copy or photograph, where appropriate, the

following materials:

1.   Pursuant to Rule 16(a)(1)(A), the substance of all oral statements made by

Defendant.

2.   Pursuant to Rule 16(a)(1)(B), all written or recorded statements of

 Defendant.

3.   Pursuant to Rule 16(a)(1)(D), a copy of the Defendant's prior

criminal record.

4.   Pursuant to Rule 16(a)(1)(E), all documents, photographs, and

other tangible objects, or copies of portions thereof that (i) is material to preparing the defense;

(ii) the Government intends to use in its case in chief at trial;(iii) the item was obtained from or

belongs to defendant.

5.   Pursuant to Rule 16(a)(1)(F), all reports of physical and mental

 examination and of any scientific test or experiment

6.   Pursuant to Rule 16(a)(1)(G), the name(s) of any expert witness

and the requisite summary of testimony the Government intends to utilize as evidence in chief at

trial.

7.   All evidence favorable to the Defendant on the issues of guilt

or punishment.

                                        Respectfully submitted,

                                        s/ Donna M. Grill
                                        DONNA M. GRILL (#0062141)
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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on May 16, 2017 a copy of the foregoing Request for

Discovery was electronically filed.   Notice of this filing will be sent by operation of the Court's

electronic filing system to all parties indicated on the electronic filing reports.   All other parties

will be served by regular U. S. Mail. Parties may access this filing through the Court's system.

s/Donna M. Grill
Donna M. Grill
Attorney for Defendant